



SHERWIN-WILLIAMS.

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October 15, 2010

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to EPA Comments dated October 5, 2010
EPA and NJDEP review of the August 16, 2010 *Revised Addendum to the May 2009 Supplemental RI Work Plan*
Sherwin-Williams/Hilliard's Creek Site – Former Manufacturing Plant
Incorporation of West Clementon Road Residential Properties
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

Sherwin-Williams has received and reviewed the United States Environmental Protection Agency (EPA) October 5, 2010 comments on the August 16, 2010 "*Revised Addendum to the May 2009 Supplemental RI Work Plan - Sherwin-Williams/Hilliard's Creek Site – Former Manufacturing Plant - Incorporation of West Clementon Road Residential Properties*," and has prepared the following response. For ease of review, the EPA comments are presented in italics, followed by the response.

Specific Comments

1. *Page 4 – It is stated that soil samples will be collected using direct-push technology, however, during subsequent conference calls it has been stated that soil samples will be collected using a hand auger. Please clarify the methodology which will be utilized during this initial sampling event to collect soil samples. In addition, an approximation of the depth to which samples will be collected (i.e., either a non-exceedance for arsenic or lead, or until refusal is encountered) should be presented.*

Response: In backyards and areas that are accessible, a compact Geoprobe unit (Model 540 MT) designed for limited access areas will be used to advance the soil borings. In backyards that are not accessible to the compact Geoprobe unit, then either hand-driven cores or hand augers will be used to collect soil samples for screening and/or laboratory analysis.

Borings will extend to a maximum depth of 8 feet below ground surface (bgs); however all borings will terminate at the water table, should it be encountered at a depth



shallower than 8 feet bgs. Samples will be collected at the 0.0' - 0.5' and 1.5' – 2.0' interval from all locations. Samples will be collected from subsequent depths on a case-by-case basis, should XRF or PID readings indicate that contamination is present; however, no samples will be collected below the water table.

2. The “Soil Sampling Profiles” figure (currently labeled as Figure 1 – will need to be renumbered since there is already a Figure 1) was created to present the depths at which soil samples may be collected. However, more detail of this approach needs to be presented in the text on Page 4 (Section on Sample Collection, Screening and Analysis).

Response: A Soil Sampling Protocol figure (Figure 2) is provided for reference. Additional details clarifying the screening and sampling approach have been added to the text.


3. Additional text is required which clarifies for the reviewer that additional information regarding the analytical method, data validation, and other Quality Assurance/Quality Control (i.e, duplicate samples, equipment decontamination, rinsate blank sample collection, etc.) information can be found in the July 2008 Work Plan.

Response: All sampling and analysis will be conducted pursuant to the approved Quality Assurance Project Plan (QAPP) contained within the “*Supplemental Remedial Investigation Work Plan - Sherwin-Williams / Hilliard Creek Site - Former Manufacturing Plant*” dated May 2009 and revised July 2009. Additional information regarding the analytical method, data validation and other Quality Assurance/Quality Control information (duplicate samples, equipment decontamination, etc.) may be found in the above-referenced QAPP.

Please note that the existing CLP Method ILM05.4 (cited in the above-referenced QAPP) has been updated and replaced with CLP Method ISM01.2, which is the most current analytical method for metals, mercury and cyanide analyses.

Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

cc: J. Josephson, EPA (New York)
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